

TSD File Inventory Index

Date March 7, 2005

Initial L. Henderson

Facility Name <u>Ryder-Heil Bronze, Inc. (ONE FOLDER SITE)</u>	
Facility Identification Number <u>OHD 986 981 579</u>	
A.1 General Correspondence	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	1 Correspondence
1 Correspondence	2 All Other Permitting Documents (Not Part of the ARA)
2 Notification and Acknowledgment	C.1 Compliance - (Inspection Reports)
3 Part A Application and Amendments	C.2 Compliance/Enforcement
4 Financial Insurance (Sudden, Non Sudden)	1 Land Disposal Restriction Notifications
5 Change Under Interim Status Requests	2 Import/Export Notifications
6 Annual and Biennial Reports	C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring	D.1 Corrective Action/Facility Assessment
1 Correspondence	1 RFA Correspondence
2 Reports	2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	3 State Prelim Investigation Memos
1 Correspondence	4 RFA Reports
2 Closure/Post Closure Plans, Certificates, etc.	D.2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring	1 RFI Correspondence
1 Correspondence	2 RFI Workplan
2 Reports	3 RFI Program Reports and Oversight
B.1 Administrative Record	4 RFI Draft /Final Report

Total - 7

5 RFI QAPP	7 Lab data Soil Sampling/Groundwater
6 RFI QAPP Correspondence	8 Progress Reports
7 Lab Data Soil Sampling/Groundwater	D.5 Corrective Action/Enforcement
8 RFI Progress Reports	1 Administrative Record 3008(h) Order
9 Interim Measures Correspondence	2 Other Non-AR Documents
10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	1 Forms/Checklists
1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
2 Interim Measures	1 Correspondence
3 CMS Workplan	2 Reports
4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
5 Stabilization	G.1 Risk Assessment
6 CMS Progress Reports	1 Human/Ecological Assessment
7 Lab Data, Soil Sampling/Groundwater	2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	3 Enforcement Confidential
1 CMI Correspondence	4 Ecological - Administrative Record
2 CMI Workplan	5 Permitting
3 CMI Program Reports and Oversight	6 Corrective Action Remediation Study
4 CMI Draft/Final Reports	7 Corrective Action/Remediation Implementation
5 CMI QAPP	8 Endangered Species Act
6 CMI Correspondence	9 Environmental Justice

Note Transmittal Letter to Be Included with Reports

Comments *documents do not justify individual folders per schedule.*

ID — For Official Use Only

C																		T/A	C
W																			1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☒ 4. Toxic
(D008)
XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Mary Worden

Name and Official Title (type or print)

MARY WORDEN, Sec'y-Treas.

Date Signed

6-7-90

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

0 H D 9 8 6 9 8 1 5 7 9

II. Name of Installation (Include company and specific site name)

R Y D E R - H E I L B R O N Z E I N C

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1 2 6 E I R V I N G S T

Street (continued)

City or Town

B U C Y R U S

State

ZIP Code

O H

4 4 8 2 0 -

County Code

County Name

0 1 7 C R A W F O R D

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

P O B O X 6 4 7

City or Town

B U C Y R U S

State

ZIP Code

O H

4 4 8 2 0 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

W O R D E N

(first)

M A R Y

Job Title

T R E A S U R E R

Phone Number (area code and number)

4 1 9 - 5 6 2 - 2 8 4 1

VI. Installation Contact Address (See instructions)

A. Contact Address

Location

Mailing

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)
Month Day Year

Yes

No

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
<input checked="" type="checkbox"/> 1. Generator (See Instructions)	<input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.	<input type="checkbox"/> 1. Generator Marketing to Burner	<input type="checkbox"/> 2. Specification Used Oil Fuel Marketer (for On-site Burner) Who First Claims the Oil Meets the Specification
<input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)		<input type="checkbox"/> 3. Generator Marketing to Burner	
<input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.)		<input type="checkbox"/> 4. Hazardous Waste Fuel	
<input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)		<input type="checkbox"/> a. Generator Marketing to Burner	
<input type="checkbox"/> 2. Transporter (Indicate Mode in boxes 1-5 below)	<input type="checkbox"/> b. Other Marketers	<input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device	
<input type="checkbox"/> a. For own waste only	<input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device	<input type="checkbox"/> 1. Utility Boiler	
<input type="checkbox"/> b. For commercial purposes		<input type="checkbox"/> 2. Industrial Boiler	
Mode of Transportation		<input type="checkbox"/> 3. Industrial Furnace	
<input type="checkbox"/> 1. Air	<input type="checkbox"/> 5. Underground Injection Control		
<input type="checkbox"/> 2. Rail			
<input type="checkbox"/> 3. Highway			
<input type="checkbox"/> 4. Water			
<input type="checkbox"/> 5. Other - specify _____			

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxic Characteristic (TC) (D000)	List specific EPA hazardous waste number(s) for the TC Contaminant(s)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	D008	

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 D008	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6
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X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature Mary Worden	Name and Official Title (type or print) MARY WORDEN, TREAS.	Date Signed 1-15-91
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XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region V

P.O. Box A3587
Chicago, Illinois 60690

RECEIVED

JAN 22 1991

TOXIC CHARACTERISTIC NOTIFIER

U. S. EPA, REGION V
CHICAGO, ILL.

The Toxic Characteristic Rule, promulgated on March 29, 1990, redefines the characteristic of toxicity under RCRA. Your notification indicates that you are handling waste with toxic characteristics. In order for EPA to process your notification in a timely manner, we need the following information:

☐ I am a new notifier under the Toxic Characteristic Rule.

Please list the specific four-character EPA hazardous waste codes which pertain to you. For guidelines on determining the correct four-character code, see 40 Code of Federal Regulations 261.30-33. Some of the Toxic Characteristic Constituents are printed on the reverse of this form.

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☐ I have marked TOXIC by error. I have attached a corrected Notification. I may make comments in the area below.

☒ I am a subsequent notifier whose activity is changing under the TC Rule. I have enclosed a Notification of Regulated Waste Activity (form 8700-12).

You can assist us by specifying what changes are to be made to our records (i.e. adding waste codes, change in waste activity, new contact person, etc.).

If there are no changes, you are NOT REQUIRED TO NOTIFY.

Note: The deadline for notifying the EPA of your waste activity under TC has already passed. Your prompt attention to this matter is required.

COMPLETE IN FULL and submit your Notification along with this letter to:

U.S. EPA

RCRA Activities
P.O. Box A3587
Chicago, IL 60690
(312) 886-6173

Sincerely,

Sharon Kiddon
Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

EPA Hazardous Waste Code ¹	Constituent	Chronic toxicity reference level (mg/L)	Regulatory level (mg/L)
D004	Arsenic	0.05	5.0
D005	Barium	1.0	100.0
D018	Benzene	0.005	0.5
D006	Cadmium	0.01	1.0
D019	Carbon tetrachloride	0.005	0.5
D020	Chlordane	0.0003	0.03
D021	Chlorobenzene	1	100.0
D022	Chloroform	0.06	6.0
D007	Chromium	0.05	5.0
D023	o-Cresol	2	200.0 ²
D024	m-Cresol	2	200.0 ²
D025	p-Cresol	2	200.0 ²
D026	Cresol	2	200.0 ²
D016	2,4-D	0.1	10.0
D027	1,4-Dichlorobenzene	0.075	7.5
D028	1,2-Dichloroethane	0.005	0.5
D029	1,1-Dichloroethylene	0.007	0.7
D030	2,4-Dinitrotoluene	0.0005	0.13
D012	Endrin	0.0002	0.02
D031	Heptachlor (and its hydroxide)	0.00006	0.008
D032	Hexachlorobenzene	0.0002	0.13
D033	Hexachloro-1,3-butadiene	0.005	0.5
D034	Hexachloroethane	0.03	3.0
D008	Lead	0.05	5.0
D013	Lindane	0.004	0.4
D009	Mercury	0.002	0.2
D014	Methoxychlor	0.1	10.0
D035	Methyl ethyl ketone	2	200.0
D036	Nitrobenzene	0.02	2.0
D037	Pentachlorophenol	1	100.0
D038	Pyridine	0.04	5.0
D010	Selenium	0.01	1.0
D011	Silver	0.05	5.0
D039	Tetrachloroethylene	0.007	0.7
D015	Toxaphene	0.005	0.5
D040	Trichloroethylene	0.005	0.5
D041	2,4,5-Trichlorophenol	4	400.0
D042	2,4,6-Trichlorophenol	0.02	2.0
D017	2,4,5-TP (Silvex)	0.01	1.0
D043	Vinyl chloride	0.002	0.2

¹ This is the EPA waste code that belongs on the Notification in area IX A, *Characteristics of Nonlisted Hazardous Wastes* on the reverse of form 8700-12 (Revision 1-90).

² If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level for total cresol is 200 mg/L.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

March 11, 1993

Ryder-Heil Bronze Inc.
Attn: Mary Worden
P.O. Box 647
Bucyrus, OH 44820

APR 9 1993
WMD RCMA
RECORD CENTER

RE: EPA ID#: OHD986981579

LOCATION of INSTALLATION: 126 E Irving St
Bucyrus, OH 44820

In response to your request of February 1993 the following information has been updated:

Status: large quantity generator

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office



Printed on recycled paper



State of Ohio Environmental Protection Agency

A.4.1

STREET ADDRESS:

70 WaterMark Drive
mbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

March 13, 1996

Re: Completion of Closure
Ryder-Heil Bronze, Inc.
U.S. EPA ID No.
OHD986981579

Ms. Mary Worden, Treasurer
Ryder-Heil Bronze, Inc.
126 E. Irving Street
Bucyrus, Ohio 44820

Dear Ms. Worden:

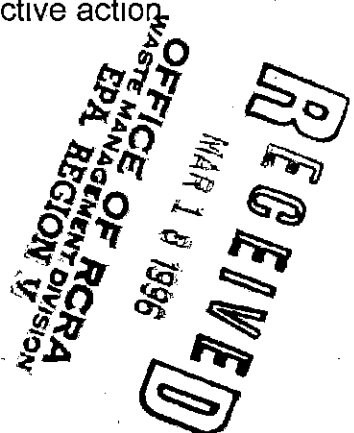
According to Ohio EPA records, on May 18, 1995, the Director of the Ohio EPA approved a closure plan for Ryder-Heil Bronze, Inc., 126 E. Irving Street, Bucyrus, Ohio 44820. The plan concerned the former hazardous waste spent core sand bin area at the facility. On January 30, 1996, Ohio EPA central office received certification documents stating that the spent core sand bin area had been closed according to the specifications in the approved closure plan. Ohio EPA District Office personnel completed a closure inspection and a review of documents pertaining to the former hazardous waste spent core sand bin area on February 14, 1996.

Based on this inspection and review, the Ohio EPA has determined that the former hazardous waste spent core sand bin area has been closed in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC). Ryder-Heil Bronze, Inc., will no longer operate as a treatment, storage, and disposal (TSD) facility but will continue to operate as a large quantity generator (LQG) of hazardous waste.

As specified in OAC Rule 3745-66-40, Ryder-Heil Bronze, Inc., will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurrences at this location, in accordance with OAC Rules 3745-66-43(H) and 3745-66-47(E).

Please note that this letter does not relieve the facility of any corrective action responsibilities that may be required.

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Ryder-Heil Bronze, Inc.
Completion of Closure
Page 2

If you have any questions concerning the closure process or the current status of the facility please contact the Ohio EPA, Northwest District Office, Attn: Melissa Winzeler, 347 North Dunbridge Road, Bowling Green, Ohio 43402, tel: (419) 352-8461.

Sincerely yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

cc: Harriet Croke, U.S. EPA, Region 5 ✓
Montee Sulieman, DHWM
Maria Velalis, DHWM
Melissa Winzeler, NWDO

[The page contains faint, illegible markings and noise.]



State of Ohio Environmental Protection Agency

STREET ADDRESS:

WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

May 17, 1995

Re: CLOSURE PLAN
RYDER-HEIL BRONZE, INC.
OHD 986 981 579
Crawford County

Ms. Mary Worden, Treasurer
Ryder-Heil Bronze, Inc.
126 E. Irving Street
Bucyrus, Ohio 44820-0647

Dear Ms. Worden:

On October 11, 1994, Ryder-Heil Bronze, Inc. (RHB) submitted to Ohio EPA a closure plan for the former spent core sand (D008) waste pile located at 126 E. Irving Street, Bucyrus, Ohio. Revisions to the closure plan were received on January 23, 1995. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that RHB's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of RHB, in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of RHB's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility (former spent core sand waste pile) at 126 E. Irving Street, Bucyrus, Ohio, as modified herein, meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA on October 11, 1994 and revised on January 23, 1995 by RHB is hereby approved with the following modifications:

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By: Mary Carvin Date 5-18-95

OHIO E.P.A.

MAY 18 95

ENTERED DIRECTOR'S JOURNAL

1. **Section 3.7, Schedule for Closure**

Within fifteen (15) days of receipt of this approval letter, RHB shall submit to the Ohio EPA, Northwest District Office (NWDO), a schedule which shows duration (expressed in number of days) of all critical closure activities, including but not limited to decontamination process, waste removal, sampling, soil removal, critical points when the independent engineer or his representative will be present, independent engineer's certification, and any other relevant activities. This schedule should start at the point of Director's approval.

2. **Section 3.10, Decontamination Efforts**

RHB must continue their decontamination effort to clean all contaminated surfaces until at least 0.6 centimeters (0.236 inches) of the outer surface layer of porous materials (concrete) has been removed. Following the removal, RHB must verify that a treatment to a "clean debris surface" has been accomplished. This verification should be based on machinery design specifications and level of effort, and must include a description of the visual condition of the "clean debris surface" following the sandblasting operations. RHB must conduct porous material removal as described above, and submit required information to the Ohio EPA, NWDO within fifteen (15) days of receipt of this approval letter.

3. **Appendix D, Section 9.1, Parameters To Be Analyzed**

This Section of the closure plan is hereby modified to state that each soil sample will be analyzed for total cadmium and total lead to define the full extent of vertical and horizontal soil contamination, in accordance with Sections 3.11 and 3.13 of the "Closure Plan Review Guidance for RCRA Facilities", Interim Final, September 1, 1993.

OHIO E.P.A.

MAY 18 95

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

ENTERED DIRECTOR'S JOURNAL

By: Mary Carvin Date 5-18-95

Ms. Mary Worden
Ryder-Heil Bronze, Inc.
Page Three

4. Appendix D, Sections 9.1 and 9.5

These sections are hereby modified to state that SW-846 Method 7131 will be used to analyze soils for total cadmium.

Within fifteen (15) days of receipt of this approval letter, RHB shall submit responses to the above modifications to the Ohio EPA, Northwest District Office and Central Office to confirm their understanding of the modifications. Where necessary, the district inspector may require changes to the responses to ensure compliance with OAC Rules 3745-66-11 and 3745-66-12. Delays in reaching final agreement on the responses cannot be used to delay closure without an extension of time being granted pursuant to OAC Rule 3745-66-13. The closure period of one hundred eighty (180) days begins with the day of the closure plan approval.

Please be advised that approval of this closure plan does not release Ryder-Heil Bronze, Inc. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq. of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601 et seq., as amended by the Superfund

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By: Mary Carvin Date 5-18-95

OHIO E.P.A.

MAY 18 95

ENTERED DIRECTOR'S JOURNAL

Ms. Mary Worden
Ryder-Heil Bronze, Inc.
Page Four

Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

All information must be submitted to:

Colleen Weaver
Ohio EPA
Division of Hazardous
Waste Management
347 N. Dunbridge
Bowling Green, Ohio 43402

Thomas Crepeau
Ohio EPA
Division of Hazardous
Waste Management
P.O. Box 1049
Columbus, Ohio 43216-1049

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By:

Mary Carvin

Date

5-18-95

OHIO E.P.A.

MAY 18 95

ENTERED DIRECTOR'S JOURNAL

Ms. Mary Worden
Ryder-Heil Bronze, Inc.
Page Five

closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to: Melissa Winzeler, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Donald R. Schregardus
Director

cc: Central File, DHWM, CO
Montee Suleiman, DHWM, CO
Harriet Croke, Ohio Permit Section, U.S. EPA - Region V
Melissa Winzeler, DHWM, NWDO

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By: Mary Carvin Date 5-18-95

OHIO E.P.A.

MAY 18 95

ENTERED DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
4) 644-3020
FAX (614) 644-2329

RECEIVED

DEC 27 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

George V. Voinovich
Governor

NOTICE OF DEFICIENCY

CERTIFIED MAIL

December 21, 1994

Re: Closure Plan
Ryder-Heil Bronze, Inc.
OHD 986 981 579
Former Stockpile Area

Ms. Mary Worden, Treasurer
Ryder-Heil Bronze, Inc.
126 E. Irving Street
Bucyrus, Ohio 44820-0647

Dear Ms. Worden:

On October 11, 1994 Ohio EPA received from Ryder-Heil Bronze, Inc. a closure plan for the former spent core sand (D008) wastepile located at 126 E. Irving Street, Bucyrus, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the Ryder-Heil Bronze, Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule 3745-66-12. The public comment period extended from October 24, 1994 through November 28, 1994. No public comments were received by Ohio EPA.

Pursuant to OAC Rule 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A. Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

The modified closure plan shall be prepared in accordance with the following editorial protocol or convention:



Ms. Mary Worden

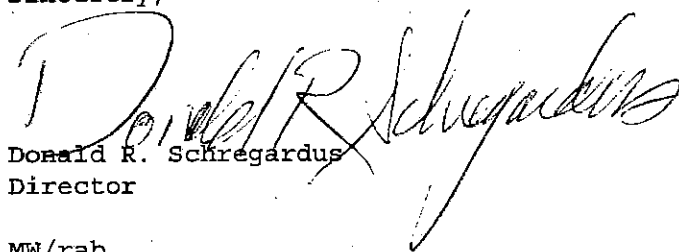
Page Two

2. New Language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Manager, Data Management Section, P.O. Box 163669, Columbus, Ohio 43216-3669. Two copies should also be sent to: Melissa Winzeler, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Upon review of the resubmitted plan, I will prepare and issue a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Melissa Winzeler at (419) 352-8461.

Sincerely,



Donald R. Schregardus
Director

MW/rab

pc: Tom Crepeau, DHWM, Central File, Ohio EPA
Gordon Garcia, Ohio Permit Section, USEPA, Region V
Montee Suleiman, DHWM, CO, Ohio EPA
Melissa Winzeler, DHWM, NWDO, Ohio EPA
Dan Redmond, Metcalf & Eddy

ATTACHMENT A

Ryder-Heil Bronze, Inc.
OHD 986 981 579

The following general comments pertain to the closure plan submitted for the former stockpile of D008 core sand.

1. **Section 3.1, Description of Facility.** The facility description must include references to any environmental permits held by the facility (e.g. NPDES, air permits, etc.) along with corresponding permit identification numbers.
2. **Section 3.3, Map of Facility.** To better characterize the location of the storage unit, a topographic map marked with the location of the facility must be included in the revised closure plan.
3. **Section 3.5, List of Hazardous Waste.** If applicable, this section should list wastes other than D008 spent core sand which have been stored in the concrete storage area. If no other hazardous wastes have been stored at the location of the former stockpile, then the plan should state such.
4. **Section 3.6, Removal of Waste.** A copy of the completed hazardous waste manifest for the shipment of the cleanup residue must be submitted to the Ohio EPA.
5. **Section 3.9, Personnel Safety and Fire Prevention.** With regard to personnel safety and training, Ryder-Heil Bronze, Inc. must further address the following: protective clothing used during the closure and personnel decontamination procedures. Please describe the personal protective clothing in more detail (e.g. gloves and coverall materials, respirator cartridge type, etc.).

The "Closure Plan Review Guidance for RCRA Facilities" requires that "all personnel involved in the closure or those possibly exposed to hazardous waste by the closure activity" must have completed training according to OSHA requirements in Title 29 of the Code of Federal Regulations (CFR) Part 1910.120. Therefore, the closure activities completed to date should have been executed by personnel who have satisfactorily completed training under 29 CFR 1910.120. The Ohio EPA will not pursue this issue as it relates to closure activities which have already been completed. However, the Ohio EPA does not approve or condone the completion of the closure of this unpermitted hazardous waste storage unit without the required personnel safety and training.

It will be necessary for the personnel involved in the sampling activities (e.g. concrete and soil borings, sample collection, decontamination, etc.) to have completed the necessary training under 29 CFR 1910.120. Section 3.9 of the closure plan and Section 6.0 of the sampling plan must be revised to state that personnel involved with the sampling activities will have training according to 29 CFR 1910.120. The training certificates, from both initial training and the most recent refresher course, from involved individuals must be included with the submittal of the revised closure plan.

Section 3.9 should address decontamination procedures for personnel involved with closure activities. Section 3.9 mentions decontamination of equipment but fails to address decontamination and/or disposal of personnel protective equipment (e.g. coveralls, respiratory equipment, gloves, boots, etc). The closure plan must be revised to include this information.

6. **Section 3.10, Decontamination Efforts.** Section 3.9 of the closure plan mentions that equipment used during the closure activities will be cleaned by brushing and rinsing. The closure plan must more fully describe the management of dry residues brushed from the equipment and management of the rinseate. The rinsing procedure must also be described (e.g. location of procedure; use of detergent, if applicable; method of rinseate collection; etc.).

According to Section 3.7 of the closure plan, in lieu of cleaning contaminated surfaces to certain analytical standards, Ryder-Heil Bronze, Inc. used a physical extraction process (i.e. sandblasting) to remove the outer surface layer of porous materials. Based on the machinery design specifications and level of effort, the plan must state the estimated depth of concrete removal. The revised closure plan must also describe the visual condition of the "clean debris surface" following the sandblasting operations. The description should include any notable remaining visual staining or discoloration.

Section 7.0 of the sampling plan states that the sampling equipment will be decontaminated by a double rinse. This section must be revised as the "Closure Plan Review Guidance for RCRA Facilities" requires that reusable equipment, such as sampling equipment, be decontaminated by removing dry residue from the exposed surfaces followed by at least three separate rinses. Section 7.0 must describe how plastic sheeting and other disposable equipment generated from the decontamination activities will be managed. Although it appears to be suggested in the sampling plan, Section 7.0 must clearly state that the rinseate (including the first,

intermediate and final rinses) and other debris will be managed as hazardous waste unless sampling results demonstrate that the rinseate and debris is "non-hazardous".

7. **Section 3.11, Remediation Standards for Soils.** Section 8.0 of the sampling plan discusses the clean level for soil. The plan mentions two soil clean-up concentrations presented in the "Closure Plan Review Guidance for RCRA Facilities". The Guidance allows the use of Alternative A (site-specific background) or Alternative B (Ohio Farm Soils levels) for soils contaminated with heavy metals. Section 8.0 must be revised to state which of the two options will be selected for the closure activities at Ryder-Heil Bronze, Inc.

It should be noted that if Alternative A is selected, twelve background soil sampling points must be selected to represent an area not affected by the RCRA unit or any other concentrated waste management or product handling activities (e.g. baghouse area). Additionally, Section 9.3 (Background Samples) and the Figure presented in Section 3.2 of sampling plan would require modification to include the background sampling locations. Please refer to the comments regarding Section 3.13 for additional discussion about background sampling locations.

8. **Section 3.12, Risk-Based Remediation Standards.** According to the Ohio EPA DHWM Closure Unit, the use of a risk-based closure performance standard is not an option for closing hazardous waste units in which lead is the primary constituent of concern. USEPA recommended exposure limits for lead have not yet been determined. Reference to risk-based closure options should be removed from Section 3.12 of the closure plan.
9. **Section 3.13, Sampling Plan and Analytical Procedures.** Section 9.1 and Section 9.3 of the sampling plan discuss the parameters to be analyzed. The Ohio EPA is primarily concerned with determining the soil concentrations of the "constituents of concern", therefore it will only be necessary for the soil to be analyzed for lead and cadmium. Section 9.1 must specify when analysis for total lead and cadmium will be tested for versus TCLP lead and cadmium. The clean-up levels for soil noted in Section 8.0 of the sampling plan require the results to be provided for total metals while the final disposition of any closure related waste may need to be based on TCLP analysis.

The revised sampling plan must include example sample log sheets and chain-of-custody forms to be used to track the soil samples. In addition to the use of rinseate blanks noted in Section 8.0 of the sampling plan, additional quality assurance/quality control (QA/QC) protocols to determine

errors in sampling and analysis procedures must be proposed in the revised submittal. For instance, QA/QC samples may include: field blanks, field replicates, trip blanks, and/or matrix spikes.

As water run-off controls have not historically been used in conjunction with the former waste pile, it will be necessary to collect additional soil samples beneath the gravel parking area located south of the concrete containment bin.

The sampling plan proposes the collection of five background samples around the perimeter of the concrete containment bin. Due to the proximity of the bin, these samples cannot be considered background samples as they may have been affected by the waste management unit (e.g. water run-off, deposition of windborne baghouse dust and sand, etc.). These samples must still be collected and analyzed to determine the full extent of contamination. If Ryder-Heil Bronze, Inc. decides to base the clean level for soil on site-specific background samples (see discussion regarding Alternative A in comments for Section 3.11), twelve background samples located further away from the unit and other possible sources of lead (e.g. baghouse area) will need to be collected.

10. **Section 3.16, Certification.** The closure plan must state that the certification statement signed by both the owner/operator of the waste unit and a qualified, independent registered professional engineer registered in Ohio will include the exact wording found in OAC 3745-50-42(D). Another option is to include the entire statement found in OAC 3745-50-42(D) in Section 3.16 of the closure plan but postpone signing the statement until the closure certification report is submitted to the Ohio EPA.



State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
FAX (614) 644-2329

RECEIVED

OCT 24 1994

George V. Voinovich
Governor

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

October 20, 1994

Re: Receipt of Closure Plan
U.S. EPA ID No.
OHD986981579

10/11/94
NOTICE GIVEN

Ryder-Heil Bronze Inc.
Attn: Ms. Mary Worden
126 E. Irving Street
Bucyrus, Ohio 44820-0647

Dear Ms. Worden:

With this letter the Ohio EPA acknowledges receipt of the hazardous waste full closure plan submitted by Aniline Environmental for Ryder-Heil Bronze Inc. of Bucyrus, Ohio. The closure plan concerns the facility's hazardous waste cement sand bin. A public notice concerning receipt of this plan will appear the week of October 24, 1994 in the legal notice section of the Bucyrus Telegraph-Forum. The Director of Ohio EPA will act upon the plan after the close of the public comment period on November 28, 1994.

A copy of the closure plan will be available for public review at the Bucyrus Public Library, 200 E. Mansfield, Bucyrus, Ohio 44820-2381, and at the Ohio EPA, Northwest District Office, 347 N. Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402, tel: (419) 352-8461.

Please contact Melissa Winzeler of the Northwest District Office if you have any questions on this matter.

Sincerely yours,

Thomas E. Crepeau
Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

cc. Harriet Croke, U.S. EPA, Region 5
Ed Kitchen, DHWM
Melissa Winzeler, NWDO



Printed on recycled paper

EPA 1613 (rev. 5/94)

PUBLIC NOTICE

CRAWFORD COUNTY

NOTICE OF RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

Notice is hereby given of the receipt on October 11, 1994 of a hazardous waste full closure plan from Ryder-Heil Bronze, Inc., 126 E. Irving, Bucyrus, Ohio 44820, U.S. EPA I.D. No. OHD986981579. The plan concerns the hazardous waste cement sand bin at the same address. Notice is given pursuant to Rule 3745-66-10 through 17 of the Ohio Administrative Code and 40 CFR, Subpart G, 265.110 through 117. The Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous & Solid Waste Amendments of 1984, which concern any possible uncorrected releases of hazardous waste or hazardous waste constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

A copy of the facility's closure plan will be available for public review at the Bucyrus Public Library, 200 E. Mansfield, in Bucyrus, and at the Ohio EPA, Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402, tel: (419) 352-8461. Comments concerning this plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action may be submitted within 30 days of this notice to the Ohio EPA, Division of Hazardous Waste Management, Attn: Data Management Section, 1800 Watermark Dr., Columbus, Ohio 43215-1099, tel: (614) 644-2977.



Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☒ Return to Compliance

Facility Name and Location and Id: *Ryder- Heil Browne*
04D 986 981 579
126 E. Irving St.
Bucyrus, OH 44820
Assigned Staff: *Mike Cunningham* Phone: *886.4464*

Name	Signature	Date
Author	<i>[Signature]</i>	<i>10-15-08</i>
Regional Counsel	<i>—</i>	<i>—</i>
Section Chief	<i>[Signature]</i>	<i>10/15-08</i>
Branch Chief	<i>[Signature]</i>	<i>10/16/08</i>

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file; and
 - One copy for the official file; Note: original inspection report goes into file room.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 17 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Herb Kleine, Owner
Ryder-Heil Bronze, Incorporated
126 East Irving Street
Bucyrus, Ohio 44820

Re: Compliance Evaluation Inspection
EPA I.D. No.: OHD 986 981 579

Dear Mr. Kleine:

On April 30, 2008, representatives of the United States Environmental Protection Agency and the Ohio Environmental Protection Agency inspected Ryder-Heil Bronze, Incorporated (Ryder-Heil) located in Bucyrus, Ohio. In response to violations of the hazardous waste generator regulations identified during the inspection, EPA issued a Notice of Violation to Ryder-Heil on July 1, 2008. Subsequent to EPA's Notice of Violation you submitted additional information regarding the identified violations in correspondence dated October 10, 2008.

This letter is to inform you that EPA has reviewed the referenced response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and Ohio EPA will continue to evaluate Ryder-Heil in the future.

If you have any questions regarding this letter, please contact Michael Cunningham, of my staff, at (312) 886-4464.

Sincerely,

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Amy Heller, OEPA, Northwest District Office

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Herb Kleine, Owner
 Ryder-Heil Bronze, Incorporated
 126 East Irving Street
 Bucyrus, Ohio 44820

2. Article Number
 (Transfer from service label)

7001 0320 0005 9025 5131

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) HERB KLEINE B. Date of Delivery 10/21/08
 C. Signature [Signature] Agent ☐ Addressee ☒
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes



Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Return to Compliance

Facility Name and Location and Id: *Ryder-Heil Bronze*
126 E Irving Street *Bucyrus, Ohio*
OHID 986 981 579
Assigned Staff: *Mike Cunningham* Phone: *886-4464*

Name	Signature	Date
Author	<i>[Signature]</i>	<i>6-26-08</i>
<i>Thorn</i> Regional Counsel	<i>[Signature]</i>	<i>6/26/08</i>
Section Chief		
Branch Chief	<i>[Signature]</i> <i>Mike Hain</i>	<i>6-22-08</i>

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file; and
 - One copy for the official file; Note: original inspection report goes into file room.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 0 1 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Herb Kleine, Plant Manager
Ryder-Heil Bronze, Incorporated
126 East Irving Street
Bucyrus, Ohio 44820

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: OHD 986 981 579

Dear Mr. Kleine:

On April 30, 2008, representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency (OEPA) inspected Ryder-Heil Bronze, Incorporated (Ryder-Heil) located in Bucyrus, Ohio. The purpose of the inspection was to evaluate Ryder-Heil's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report for EPA's evaluation is enclosed for your reference.

Based on information provided by Ryder-Heil personnel, a review of records, and physical observations by the inspectors, EPA has determined that Ryder-Heil is in violation of the following requirements:

1. In order to avoid the need for a hazardous waste permit, a hazardous waste generator must have a training program which teaches facility personnel hazardous waste management procedures relevant to their positions. See OAC 3745-52-34(A)(4) [40 CFR § 262.34(a)(4)]. This is also a requirement of owners and operators of hazardous waste facilities under OAC 3745-65-16(A) [40 CFR § 265.16(a)].

At the time of the inspection Ryder-Heil did not have a program in place which teaches facility personnel hazardous waste management procedures relevant to their positions. Ryder-Heil, therefore, failed to comply with the above-mentioned condition for a permit exemption, and violated the personnel training requirements of OAC 3745-55-16(A).

2. In order to avoid the need for a hazardous waste permit, a hazardous waste generator must provide annual hazardous waste refresher training to employees relevant to their positions. See

failed to comply with the lamp storage requirement of OAC 3745-273-13(D)(2).

7. A universal waste handler who stores waste lamps must label the lamps with the words "Universal Waste – Lamps" or "Waste Lamps" or "Used Lamps". See OAC 3745-273-14(E) [40 CFR § 273.14(e)].

At the time of the inspection spent lamps being stored near the entrance to the garage were not labeled with the words "Universal Waste – Lamps" or "Waste Lamps" or "Used Lamps". Ryder-Heil, therefore, failed to comply with the lamp storage requirement of OAC 3745-273-14(E).

8. A universal waste handler who stores waste lamps must document the length of time the universal waste is stored. See OAC 3745-273-15(C) [40 CFR § 273.15(c)].

At the time of the inspection Ryder-Heil had not documented the length of time the spent lamps near the entrance to the garage were stored. Ryder-Heil, therefore, failed to comply with the lamp storage requirement of OAC 3745-273-15(C).

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response within 30 days upon receipt of this notice to Michael Cunningham, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J Chicago, Illinois 60604. You should also send a copy of your response to Amy Heller, Ohio Environmental Protection Agency Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

If you have any questions regarding this letter, please contact Michael Cunningham, of my staff, at (312) 886-4464.

Sincerely,



Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Amy Heller, OEPA, NWDO w/enc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD RCS2, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Ryder-Heil Bronze, Incorporated

EPA ID No.: OHD 986 981 579

ADDRESS: 126 East Irving Street
Bucyrus, Ohio 44820

DATE OF INSPECTION: April 30, 2008

EPA INSPECTOR: Michael Cunningham

STATE INSPECTOR: Amy Heller

PREPARED BY:

Michael Cunningham

May 15, 2008
Date Completed

ACCEPTED BY:

Michael Little for
Paul Little, Chief
Compliance Section # 2

May 23, 2008
Date

Record Review

The inspectors reviewed hazardous waste manifests for 2007 and 2008, the contingency plan, and personnel training records. Ryder-Heil has not been conducting and documenting weekly inspections of the hazardous waste container area. In addition, Ryder-Heil does not have a hazardous waste refresher training program, and has not provided annual refresher training to the employees.

Closing Conference

I summarized my review of the site and told the facility personnel that I would provide the follow-up response and report.

Photos:

- 1 and 2: Core Bin;
- 3: Blaster Drum;
- 4 and 5: Transport Buggy;
- 6: containers of used oil.

Attachments: Large Quantity Generator and Universal Waste checklists.

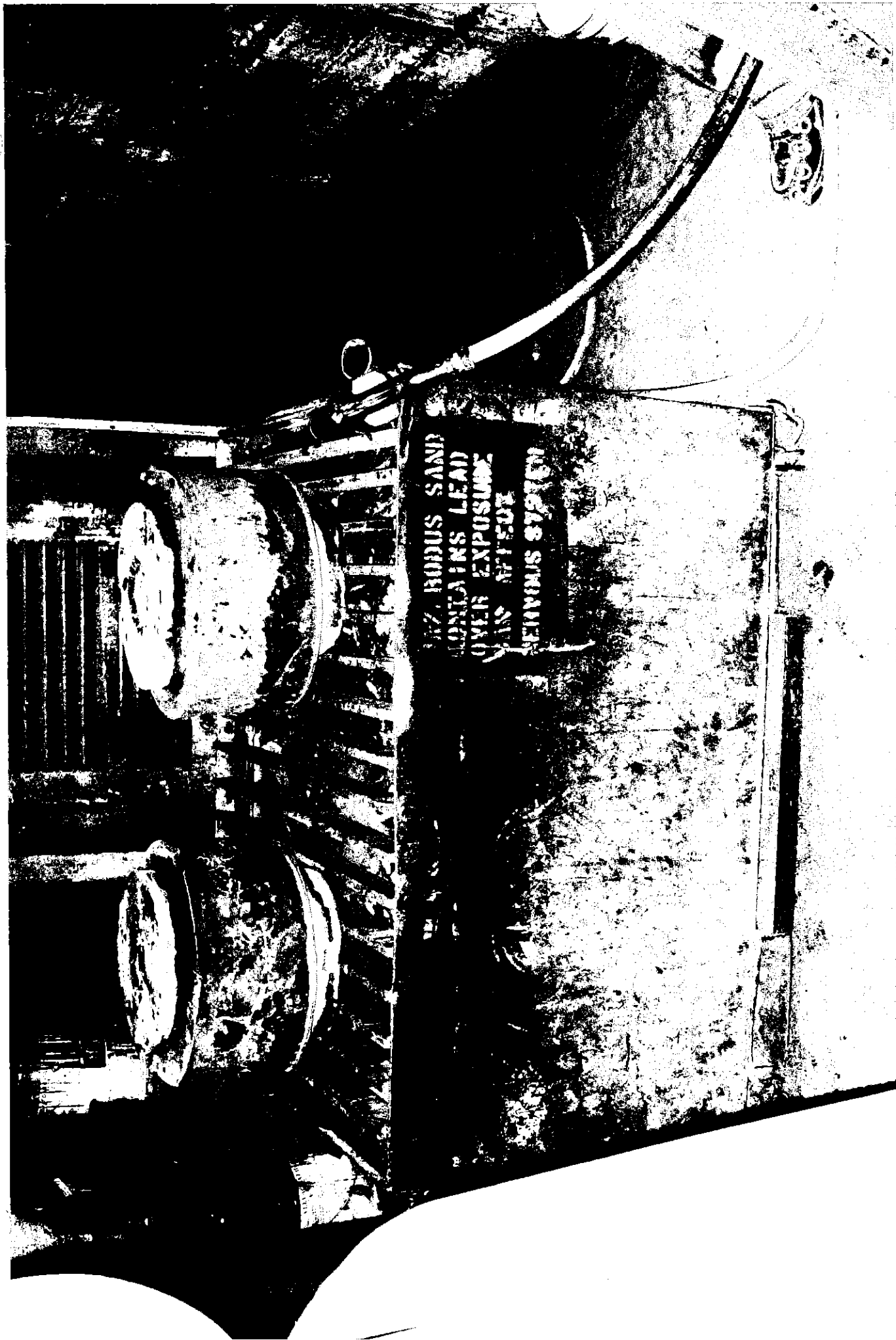


Photo 1 : core bin

HAZARDOUS SITE
CONTAINMENT
OVER EXPOSURE
CAN AFFECT
NEARBY SYSTEMS

05/10/2008

Photo 2 : wording on core B.W



Photo 3: Blaster Drum

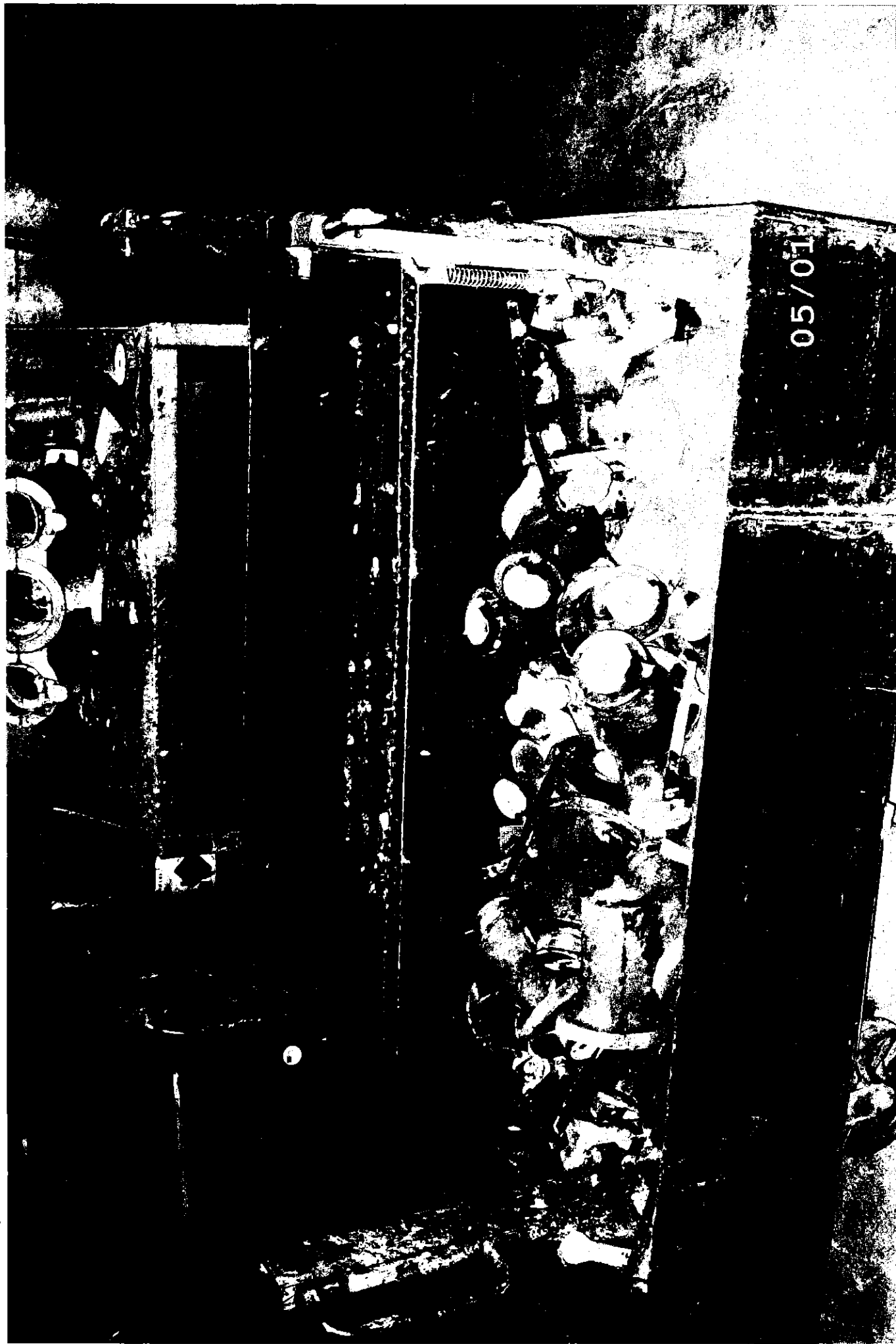


Photo 4: Transport Buggy



05/01

Photo 5: Transport Buggy



05/01/200

Photo 6: Containers of used oil.

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☒ No ☐ N/A ☐
2. Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] Yes ☒ No ☐ N/A ☐
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes ☒ No ☐ N/A ☐
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes ☒ No ☐ N/A ☐
5. Are annual reports kept on file for at least 3 years? [3745-52-40(B)] Yes ☒ No ☐ N/A ☐
6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes ☐ No ☒ N/A ☐
7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes ☐ No ☒ N/A ☐
8. Does the generator accumulate hazardous waste? Yes ☒ No ☐ N/A ☐

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes ☐ No ☒ N/A ☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
- a. Container that meets 3745-66-70 to 3745-66-77? Yes ☐ No ☒ N/A ☐
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes ☐ No ☒ N/A ☐
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes ☐ No ☒ N/A ☐
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes ☐ No ☒ N/A ☐

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11. Does the generator export hazardous waste? If so:
- a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes ☐ No ☒ N/A ☐
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ☐ No ☐ N/A ☒
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes ☐ No ☐ N/A ☒
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ☐ No ☐ N/A ☒
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes ☐ No ☐ N/A ☒

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ☒ No ☐ N/A ☐
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes ☒ No ☐ N/A ☐

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes ☒ No ☐ N/A ☐

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☒ No ☐ N/A ☐
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes ☒ No ☐ N/A ☐

[Facility Name/Inspection Date]

[ID number]

LQG/February 2007

Page 1 of 4

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ☒ No ☐ N/A ☐
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ☐ No ☐ N/A ☒
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes ☒ No ☐ N/A ☐

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☐ No ☒ N/A ☐
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes ☐ No ☒ N/A ☐
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☐ No ☒ N/A ☐
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☒ No ☐ N/A ☐
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☐ No ☒ N/A ☐
25. Does the generator keep records and documentation of:
- a. Job titles [3745-65-16D(1)]? Yes ☒ No ☐ N/A ☐
 - b. Job descriptions [3745-65-16D(2)]? Yes ☒ No ☐ N/A ☐
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes ☒ No ☐ N/A ☐
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes ☒ No ☐ N/A ☐
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
---------------	------------------	--------------

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ☐
28. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes ☒ No ☐ N/A ☐
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes ☒ No ☐ N/A ☐
 - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes ☒ No ☐ N/A ☐
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes ☒ No ☐ N/A ☐

- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☒ No ☐ N/A ☐
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes ☐ No ☐ N/A ☒
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ☐ No ☒ N/A ☐
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes ☐ No ☐ N/A ☒
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ☐ No ☐ N/A ☒
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
- a. Internal communications or alarm system? [3745-65-32(A)] Yes ☒ No ☐ N/A ☐
- b. Emergency communication device? [3745-65-32(B)] Yes ☒ No ☐ N/A ☐
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes ☒ No ☐ N/A ☐
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes ☒ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☒ No ☐ N/A ☐
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☒ No ☐ N/A ☐
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes ☒ No ☐ N/A ☐
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes ☒ No ☐ N/A ☐
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ☒ No ☐ N/A ☐

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes ☒ No ☐ N/A ☐
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☒ No ☐ N/A ☐
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☐ No ☒ N/A ☐
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☒ No ☐ N/A ☐
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☒ No ☐ N/A ☐
- b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐
- c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC §1.44(A) "Week" means 7 consecutive days. Yes ☐ No ☒ N/A ☐
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☐ No ☒ N/A ☐
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☐ No ☒ N/A ☒
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes ☐ No ☐ N/A ☒
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes ☐ No ☐ N/A ☒
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☒

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes ☒ No ☐ N/A ☐
54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☒ No ☐ N/A ☐
55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes ☐ No ☒ N/A ☐ RMK# ☐
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes ☐ No ☒ N/A ☐ RMK# ☐

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ☐ No ☐ N/A ☒ RMK# ☐
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ☐ No ☐ N/A ☒ RMK# ☐
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ☐ No ☐ N/A ☒ RMK# ☐
- b. Mix battery types in one container? Yes ☐ No ☐ N/A ☒ RMK# ☐
- c. Discharge batteries to remove the electric charge? Yes ☐ No ☐ N/A ☒ RMK# ☐
- d. Regenerated used batteries? Yes ☐ No ☐ N/A ☒ RMK# ☐
- e. Disassemble them into individual batteries or cells? Yes ☐ No ☐ N/A ☒ RMK# ☐
- f. Remove batteries from consumer products? Yes ☐ No ☐ N/A ☒ RMK# ☐
- g. Remove the electrolyte from the battery? Yes ☐ No ☐ N/A ☒ RMK# ☐
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes ☐ No ☐ N/A ☒ RMK# ☐

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No ☐ N/A ☒ RMK#___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No ☐ N/A ☒ RMK#___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No ☐ N/A ☒ RMK#___

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] Yes ___ No ☐ N/A ☒ RMK#___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes ___ No ☒ N/A ___ RMK#___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No ☒ N/A ___ RMK#___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] Yes ___ No ☒ N/A ___ RMK#___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes ☒ No ☐ N/A ☐ RMK# ☐
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ☐ No ☐ N/A ☒ RMK# ☐

NOTE: *Accumulation is defined as date generated or date received from another handler.*

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes ☐ No ☒ N/A ☐ RMK# ☐

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes ___ No ☒ N/A ___ RMK# ___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes ☒ No ☐ N/A ___ RMK# ___

15. Is the material released characterized? [3745-273-17(B)]

Yes ☒ No ☐ N/A ___ RMK# ___

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes ☒ No ☐ N/A ___ RMK# ___

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes ☒ No ☐ N/A ___ RMK# ___

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes ☒ No ☐ N/A ___ RMK# ___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes ☒ No ☐ N/A ___ RMK# ___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

a. Receive the waste back? [3745-273-18(E)(1)]

Yes ___ No ___ N/A ☒ RMK# ___

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes ___ No ___ N/A ☒ RMK# ___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ☐ N/A ☒ RMK# ___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A ☒ RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No ☐ N/A ☒ RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No ☐ N/A ☒ RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No ☒ N/A ☒ RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No ☐ N/A ☒ RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ☐ N/A ☒ RMK# ___

REMARKS

SENDER: COMPLETE THIS SECTION

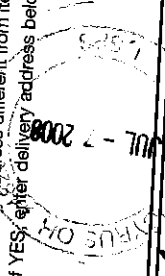
- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Herb Kline
Ryder-Heil Bronze, Incorporated
126 East Irving Street
Bucyrus, OH 44820

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)	B. Date of Delivery
C. Signature <i>[Signature]</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	



3. Service Type

☒ Certified Mail ☐ Express Mail

☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

7001 0320 0006 0184 7775

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 20 2001

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Quaintance
Plant Manager
Ryder-Heil Bronze Inc.
120 East Irving Street
Bucyrus, Ohio 44820-1409

Re: RCRA Compliance Inspection
Ryder-Heil Bronze Inc.
EPA ID No: OHD 986 981 579

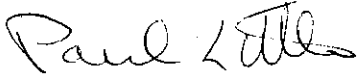
Dear Mr. Quaintance:

On February 6, 2001, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (Ohio EPA) inspected Ryder-Heil Bronze Inc.'s installation located in Bucyrus, Ohio. The purpose of the inspection was to evaluate your installation's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically, the Standards Applicable to Generators of Hazardous Waste. Ohio EPA will provide you with a copy of its inspection report under separate cover.

As of this writing, based upon information gained during the inspection U.S. EPA has determined your installation was in compliance with RCRA statutes and federal regulations which U.S. EPA has retained authority to enforce. This determination does not limit Ohio EPA's authority to enforce portions of RCRA for which the state requirements operate in lieu of the Federal regulations or under other environmental statutes. U.S. EPA and Ohio EPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter,
please contact Duncan Campbell of my staff at (312) 886-4555.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Little".

Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch

cc: Tim Killeen, Ohio EPA, NWDO

If you have any questions or concerns regarding this matter,
please contact Duncan Campbell of my staff at (312) 886-4555.

Sincerely,

Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch

cc: Tim Killeen, Ohio EPA, NWDO

bcc: RCRA File Room
Branch Reading File
Section Reading File

DE-9J\Campbell\6-4555\Share:Compliance2:Campbell\Ryder-
Heil\RTC\February 12, 2001

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY
AUTHOR/ TYPIST	Compliance Section 2 Section CHIEF
<i>PL</i> <i>02/14/01</i>	<i>PL</i> <i>2-16-01</i>



State of Ohio Environmental Protection Agency

Northwest District Office

47 North Dunbridge Road
Bowling Green, Ohio 43402
(419) 352-8461 FAX (419) 352-8468

Bob Taft
Governor

Re: Notice of Violation
Ryder Heil Bronze Inc.
OHD 986 981 579
Large Quantity Generator
Crawford County

February 16, 2001

Mr. Jim Quaintance
Ryder Heil Bronze Inc.
126 E. Irving Street
Bucyrus, Ohio 44820

Dear Mr. Quaintance:

On February 6, 2001, I inspected the Ryder Heil Bronze Inc. (RHB) facility, accompanied by Duncan Campbell from the U.S. EPA, to determine RHB's compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). During the inspection we also discussed pollution prevention activities that you have implemented to reduce the quantity of waste generated at the facility. This letter will explain the violations I found, what you need to do to correct the violations.

RHB is a manufacturer of brass bushings. These bushings are made by forming sands into a mold. Many of these molds require internal void spaces which are formed through the use of core sands. The cores are formed with CO2 and a non hazardous coating. These cores are discarded after one use. The discarded cores are a hazardous waste (D008) because they test hazardous for lead. Once the mold and the cores are assembled, the bushings are formed by pouring molten brass into the mold.

The other waste generated at the site includes bag house dust, scrap brass and slag. The bag house dust is collected from each of the three bag houses at the facility. All of this bag house dust (D008) is hazardous for lead. All of this lead bearing waste generated at the facility is collected in a 20-yard dumpster, and then transported to PermaFix in Michigan every 90 days for disposal. RHB also collects brass scraps from the machining process and then reuses the scrap in the melting process. The slag generated from the remelting is sent back to the supplier of your brass ingots for reclamation.



I found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 15 days** of your receipt of this letter:

1. Personnel Training

OAC Rule 3745-65-16 (C) RHB failed to provide an annual review of the initial training to all of the employees involved in the management of hazardous waste. Specifically, there was no documentation that six employees involved in the management of hazardous waste have received a review of the initial training since 1999.

RHB currently conducts numerous employee training programs. Several of these training programs would meet the requirements of this rule. RHB must submit an outline of the training to me for review that would include information on the proper waste handling, emergency procedures, and proper inspection procedures relevant to their responsibilities. After my review, RHB must conduct the training and submit documentation, such as a sign in sheets, to demonstrate that the training has taken place. A copy of this information must be submitted to me at Ohio EPA's, Northwest District Office (NWDO).

2. Documenting Training

OAC Rule 3745-65-16 (D) (3) RHB failed to include a written description of the type and amount of both introductory and continuing training that will be given to each person involved in the management of hazardous waste.

In order to achieve compliance, RHB must submit a job description for the foundry helper, the foundry foreman, and the emergency coordinator that included the amount of both introductory and continuing training that will be given to each person. A copy of these updated job descriptions must be submitted to me at Ohio EPA's, NWDO.

3. Emergency Information

OAC Rule 3745-65-52 (A) RHB failed to describe the actions facility personnel shall take to respond to a release of hazardous waste.

RHB must update the contingency plan to describe the actions that will be taken by the facility's personnel if there is a spill of hazardous waste. RHB must submit a copy of the updated contingency plan to me at Ohio EPA's, NWDO.

4. Closed Containers

OAC rule 3745-66-73 (A) RHB failed to maintain hazardous waste containers closed except when it is necessary to add or remove waste. Specifically, the roll-off box and a satellite drum for the shot blast bag house were both uncovered at the time of the inspection.

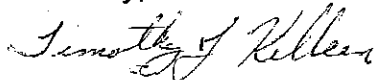
Mr. Jim Quaintance
February 16, 2001
Page 3

In order to achieve compliance, RHB must cover all containers of hazardous waste immediately. These containers must always be covered, except when it is necessary to add or remove waste. Photographic documentation that all of the satellite containers have been closed must be submitted to me at Ohio EPA's, NWDO.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. And, you may possibly reduce your regulatory requirement. You did say that RHB has found a non-lead brass alloy. However, your customers have decided not to make this change in their products specifications.

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3064. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp/oppmain.html>.

Sincerely,



Timothy J. Killeen
Division of Hazardous Waste Management

/llr

Enclosure

pc: Linda Neumann, DHWM, CO
Cindy Lohrbach, DHWM, NWDO
DHWM-NWDO File
Colleen Weaver
Duncan Campbell, U.S. EPA, Region 5

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: Ryder Heil Bronze Inc. EPA ID#: OHD 986 981 579

Street: 126 E. Irving St City: Bucyrus

County: Crawford State: Ohio Zip: 44820

Mailing Address: _____
(If different from above)

Telephone: (419) 562-2841 Fax #: _____

Owner/Operator: _____
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): February 6, 2001 Time(s): 10:00 am to

Inspection Announced? Yes ☒ NO If so, how much advance notice given? NA

	Name	Affiliation	Telephone
Inspectors:	<u>Timothy J. Killeen</u>	<u>Ohio EPA/ ES 2</u>	<u>(419) 373-3064</u>
	<u>Duncan Campbell</u>	<u>U.S. EPA</u>	<u>(312) 886-4555</u>
Facility Representative:	<u>Mary Worden</u>	<u>Finance Mgr.</u>	<u>(419) 562-2841</u>
	<u>Jim Guaintance</u>	<u>Production Mgr.</u>	<u>(419) 562-2841</u>

Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers <u>25 yrd Roll-off</u>
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Other (specify)
<input type="checkbox"/> No Generation	

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ☒ No ☒ N/A ☐ RMK# ☐

a. **If so**, what has the company done to minimize hazardous waste generation?

- ☒ A change in the process resulting in less waste.
- ☐ A change in the product resulting in less waste.
- ☐ Use of fewer and less toxic hazardous raw materials.
- ☐ Better operations/improved housekeeping.
- ☐ On-site recycling/reuse of hazardous materials.
- ☐ Sending waste off-site for recycling/reuse.
- ☐ Other activities (specify): _____

b. **If so**, what hazardous wastes have been addressed?

- ☐ Solvents
- ☐ Paint related wastes

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☐ Fluorescent light bulbs
- ☐ Used batteries
- ☐ Shop rags
- ☒ Other (specify): Core sands

c. **If not**, why hasn't the company considered P2?

- ☐ The company just never thought about it
- ☐ Lack of information about practical alternatives
- ☐ Lack of capital to make process changes
- ☐ Lack of internal management support
- ☐ The company does not generate enough hazardous waste to consider P2
- ☐ Other reason given (specify): _____

2. Does the company plan to do P2 activities in the future? Yes ___ No ☒ N/A ___ RMK# ___
3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes ___ No ☒ N/A ___ RMK# ___
4. Did you give the company information about P2 during the inspection? Yes ___ No ☒ N/A ___ RMK# ___
5. Would the company like a P2 assessment? Yes ___ No ☒ N/A ___ RMK# ___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? The bushings are manufactured per the customers specifications

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

- Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Has the generator obtained an identification number? [3745-52-12] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] Yes ☒ No ☐ N/A ☐ RMK# ☐

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: Yes ☐ No ☐ N/A ☒ RMK# ☐
- a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes ☐ No ☐ N/A ☒ RMK# ☐
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ☐ No ☐ N/A ☒ RMK# ☐
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes ☐ No ☐ N/A ☒ RMK# ☐
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ☐ No ☐ N/A ☒ RMK# ☐
- e. Are export related documents being maintained on-site? [3745-52-57] Yes ☐ No ☐ N/A ☒ RMK# ☐

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Describe the unit(s) which the generator has closed.
- b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☒ RMK# ☐

- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: *If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

REMARKS

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes ☒ No ☐

If the answer is no, show them what the statement says using a signed manifest.

NOTE: *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

2. Have item I and items (1) through (20) of each manifest been completed? [3745-52-20(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, item R and items (21) through (35) must also be completed. [3745-52-20(B)]*

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(C)] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(D)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐

a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(E)] Yes ☐ No ☐ N/A ☒ RMK# ☐

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes ☒ No ☐ N/A ☐ RMK# ☐

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ☐ No ☒ N/A ☒ RMK# ☐

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes ☒ No ☐ N/A ☐ RMK# ☐

REMARKS

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-59-07(A)] If so: Yes ☒ No ☐ N/A ☐ RMK# ☐
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-59-07(A)(5)] 1995 Analysis Yes ☐ No ☐ N/A ☒ RMK# ☐
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-59-07(A)(5)] Waste Profile filed out 9/21/00 Analytical performed in 1995 Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Does the generator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-59-03] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-59-09(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-59-07(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-59-07(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-59-09] If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-59-09(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC 3745-59-09(B)]

7. Does the generator have LDR notification (and certification, where applicable) forms for each shipment of waste? [3745-59-07(A)(1) and (A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
8. Does each notification/certification form completed contain the following information? [3745-59-07(A)(1) and (A)(2)]

a. EPA hazardous waste codes for each waste?

Yes ☒ No ☐ N/A ☐ RMK#

b. Appropriate treatment standards for each waste?

Yes ☒ No ☐ N/A ☐ RMK#

c. The manifest number?

Yes ☒ No ☐ N/A ☐ RMK#

d. Waste analysis data, where available?

Yes ☒ No ☐ N/A ☒ RMK#

e. Certification signed by the generator or an authorized representative? (for wastes meeting treatment standards only)

Yes ☒ No ☐ N/A ☐ RMK#

9. Does the generator produce a waste that is hazardous at the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-59-07(A)(6)] If so:

Yes ☐ No ☒ N/A ☐ RMK#

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the waste? [3745-59-07(A)(6)]

Yes ☐ No ☐ N/A ☒ RMK#

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit, and any characteristic hazardous waste that is rendered nonhazardous via mixing or treatment.

10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [3745-59-07(A)(7)]

Yes ☒ No ☐ N/A ☐ RMK#

11. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes nonhazardous? If so:

Yes ☐ No ☒ N/A ☐ RMK#

a. Are treated waste(s) sent to a licensed solid waste disposal facility? If so:

Yes ☐ No ☐ N/A ☒ RMK#

i. Does the generator submit a notification and certification to the Director which contains the following:

1. Name and address of the facility receiving the waste? [3745-59-09(D)(1)(a)]

Yes ☐ No ☐ N/A ☒ RMK#

2. A description of the waste, including EPA hazardous waste numbers and treatability group? [3745-59-09(D)(1)(b)]

Yes ☐ No ☐ N/A ☒ RMK#

3. The treatment standards applicable to the waste at the initial point of generation? [3745-59-09(D)(1)(c)]

Yes ☒ No ☐ N/A ☒ RMK# _____

- ii. Is the certification signed by an authorized representative and does it contain the language in OAC 3745-59-07(B)(5)(a)? [3745-59-09(D)(2)]

Yes ☒ No ☐ N/A ☒ RMK# _____

NOTE: *An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by OAC 3745-50-10.*

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ☐ No ☒ N/A ☐ RMK# ☐
 - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - b. Emergency equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - c. Emergency systems? Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Does emergency training described in 3(a), (b) and (c) above include, where applicable: [3745-65-16(A)(3)(a-f)]
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐

- b. Key parameters for automatic waste feed cut-off systems? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Communication or alarm system? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Response procedures for fire/explosions? Yes ☒ No ☐ N/A ☐ RMK# ☐
- e. Response to groundwater contamination incidents? Yes ☐ No ☐ N/A ☒ RMK# ☐
- f. Shutdown procedures? Yes ☒ No ☐ N/A ☐ RMK# ☐
5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☐ No ☒ N/A ☐ RMK# 2
8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐ RMK# ☐
9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐ RMK# ☐
10. **Optional:** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed

Name of Employee

Date(s) Trained

(3)	Facility Helper	
	Facility Foreman	
(2)	Emergency Coordinator	

REMARKS

- 1) The type of training should be listed on the job descriptions of the six employees listed above.
- 2) Refresher training has not been held since 1999.

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes ☐ No ☒ N/A ☐ RMK# ☐
- b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes ☐ No ☒ N/A ☐ RMK# 2
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]*

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes ☐ No ☐ N/A ☒ RMK# ☐

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ___ No ☒ N/A ___ RMK# ___
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A ☒ RMK# ___
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A ☒ RMK# ___
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A ☒ RMK# ___

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

REMARKS

2) All of the emergency equipment is not listed on the inspection sheet.

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Emergency communication device? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Portable fire control, spill control and decon equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Water of adequate volume/pressure? Yes ☐ No ☐ N/A ☒ RMK# ☐
3. Is emergency equipment tested (inspected) on a weekly basis and maintained as necessary? [3745-65-33] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Are emergency equipment tests (inspections) recorded in a log that includes the following information: [3745-65-33(B)]
- a. Date and time of test? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Name of person conducting the test? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Observations made? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Date/nature of any repairs? Yes ☒ No ☐ N/A ☐ RMK# ☐
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

- a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)]

Yes ___ No ☐ N/A ☒ RMK# ___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes ☐ No ☒ N/A ☐ RMK# ☐

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - b. Are under the control of the operator of the process generating the waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - c. Do not exceed a total of 55 gallons of hazardous waste? Yes ☐ No ☒ N/A ☐ RMK# ☐
 - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ☐ No ☐ N/A ☒ RMK# ☐
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ☐ No ☐ N/A ☒ RMK# ☐

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐ RMK# ☐

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☐ No ☒ N/A ☐ RMK# ☐
- b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist) Yes ☒ No ☐ N/A ☐ RMK# ☐
8. Are inspections described in Question No. 7 recorded in a log which contains the following information: [3745-66-74(B)]
- a. Date and time of inspection? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Name of inspector? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Observations made during the inspection? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Date/nature of any repairs or remedial action? Yes ☒ No ☐ N/A ☐ RMK# ☐
9. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☐ No ☐ N/A ☒ RMK# ☐
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes ☐ No ☐ N/A ☒ RMK# ☐

PRE-TRANSPORT REQUIREMENTS

10. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☐ No ☐ N/A ☒ RMK#
12. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐ RMK#

REMARKS

REMARKS-GENERAL INFORMATION

General Process Information: RHB is a manufacturer of brass bushings. These bushings are made by forming sands into a mold. Many of these molds require internal void spaces which are formed through the use of core sands. The cores are formed with CO₂ and a non hazardous coating. These cores are discarded after one use. The discarded cores are a hazardous waste (D008) because they test hazardous for lead. Once the mold and the cores are assembled, the bushings are formed by pouring molten brass into the mold.

The other waste generated at the site includes bag house dust, scrap brass and slag. The bag house dust is collected from each of the three bag houses at the facility. All of this bag house dust (D008) is hazardous for lead. All of this lead bearing waste generated at the facility is collected in a 20 yard dumpster, and then transported to PermaFix in Michigan every 90 days for disposal. RHB also collects brass scraps from the machining process and then reuses the scrap in the melting process. The slag generated from the remelting is sent back to the supplier of your brass ingots for reclamation.

Regulatory/Enforcement History (if applicable): In March of 1994, 22 violations were cited. The facility was returned to compliance in march of 1996.

Other:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

Ryder-Heil Bronze

OHD 986 981 579

Bucyrus, Ohio 44820

Date of RCRA Inspection: February 6, 2001

Handler Status: Large Quantity Generator
SIC: 3366 Copper Foundry

Ryder-Heil participants:

Jim Quaintance, Plant Manager

Mary Worden, Financial Manager

U.S. EPA, Region 5 participant:

Duncan Campbell, RCRA inspector

Ohio Environmental Protection Agency participant:

Tim Killeen, District Representative, NWDO

Facility's RCRA regulated history: Ryder-Heil Bronze Incorporated [Ryder] was started in the early 1900's as a bronze foundry. Its primary business was built around pouring bushings that would be used in industrial applications. In the beginning these bushings and industrial parts were left rough. Ryder was started by Mr. Ryder who continued to be active in the business until the 1970's, at which time his heirs took over control of the day-to-day operations. The family business was later purchased by three long-term employees of Mr. Ryder and remains privately held. Today, Ryder's annual sales are estimated at \$25 million, currently employees 38 people and is operating a day shift four days a week.

This installation has been located at the current address since its inception. It occupies approximately 3/4 of a city block. Initially, the facility was located outside the Buycrus town line but over time has been enveloped by residential housing which now surrounds the operation.

Ryder's principle business continues to be a foundry operation making bushings and an assortment of parts which find applications in machine tool manufacturing, food industry, bridges and railroads. Ryder responded to customer demands for more finish on the parts and developed the capability of machining its product line. Going from rough finished to highly machined parts required that Ryder purchase additional capabilities to machine parts to higher tolerances. Purchasing the additional machining capabilities necessitated the expansion of Ryder manufacturing capacity. In the 1970's, Ryder constructed a new building adjacent to house the machine shop.

Ryder works with 24 different bronze alloys. It purchases these alloys in ingots from the following four suppliers: Federal Metal in Cleveland, Kramer Metal in Chicago, Colonial Metal in Pennsylvania, and River Smelting, also in Cleveland. Ryder also buys very small quantities of scrap copper wire but does not attempt to conduct metallurgy at facility. Other than the small amounts of copper wire, Ryder does not remelt scrap metal, slag, or dross. All slag is shipped back to Federal Metal in Cleveland. Almost all of the bronze alloys Ryder works with contains some amount of lead. It also works with small amounts of aluminum bronze and magnesium bronze that do not contain lead.

Historically, demand for bronze containing lead was based on its superior lubricating properties. In the last couple of years metallurgists have developed new bronze alloys which substitute bismuth for lead. The initial indications are that bismuth provides lubricity comparable to those observed from lead. The state of California has recently adopted regulations prohibiting the inclusion of lead in all plumbing supply materials. This action has increased demand which some metal smelters have responded to by increasing production of alloys containing bismuth as a substitute to lead.

Ryder anticipates that its customers will continue to buy bronze containing lead in the near term. This is primarily due to the price differential between lead vs bismuth containing alloys. Also, customers have a wait and see attitude concerning the uncertainty of the long-term wear characteristics associated with bismuth containing bronze. Ryder anticipates that as more smelters have ready access to supplies of scrap alloy containing bismuth then the price may come into line with lead containing alloys. Ryder management indicated that one of its competitors, Oakes Foundry in Warren Ohio, has anticipated this increasing demand for lead free bronze alloys and has eliminated all lead from its product line.

RCRA Inspection: Ryder's foundry operation is situated under one roof. Supporting walls separate various aspects of the production process. Ryder's process flow is similar to the description and diagrams found in U.S. EPA's sector notebook for the Metal Casting Industry.¹ Ryder engages in two distinct processes: mold and core making, and metal melting.

Ryder uses green sand to make its molds. Green sand is made by mixing bentonite clay, carbonaceous materials and silica sand. Green sand is only used in mold making and not used to make cores. After cast has cooled and hardened the core is removed from the mold. Ryder then breaks the mold apart allowing the green sand to fall on to the concrete floor. The green sand is then scooped up and stored in a bin for reuse. Ryder keeps dust to a minimum in this area by vacuuming this area periodically throughout the day.

Ryder uses olivine silica sand to make its cores. It is essential that cores withstand the strong forces of molten metal when it fills the cavity. It is also important that the core will collapse easily once the casting has hardened. Ryder uses the cold box method to make cores using a combination of two binders made by Ashland Chemicals: Velvasol 425, and Velvacoat 854. Both products are made from isopropanol alcohol. After the sand is shaped it is injected with CO₂. The CO₂ acts as a catalyst curing the binders at room temperature dramatically reducing the cure time. This has also eliminated the time consuming step of baking the core. The two isopropanol based binders have eliminate the need to use stronger chemical such as phenolic urethane binders.

When the casting has hardened, Ryder dismantles the molding board and shakes out the core print from the sand. Core prints are brought to a knock-out box where all core sands are captured. This is necessary because the core sands will contain significant concentrations of lead which make the core sand hazardous for the lead characteristic. The knock-out box becomes the point of generation for Ryder's largest waste stream. When the knock-out box gets full the contents are dumped into a 20 cu. yd. roll-off. The roll-off is kept

¹Profile of the Metal Casting Industry, U.S. EPA, September 1997.

inside near the green sand storage bin. Ryder has contracted with Perma-Fix of Brownstown, Michigan [MID 096 963 194]. This commercial treatment facility used to be known as Chem-Met Services. Ryder has arranged for this waste to be removed four times a year.

Ryder does not conduct metallurgy at this facility. It purchases ingots containing pre-specified ratios of lead, tin, and copper. These ingots are melted in one of two electric furnaces situated in the Melt Room. A third furnace is fueled by oil and used to keep the pots hot.

Dross is skimmed from the top of the kettle. The dross will contain the concentration of impurities which would not meet product specifications. Molten metal is ladled from the furnace and hand poured into the mold. Ryder has three pouring lines.

Once the casting has cooled and hardened it is removed from the mold. The casting is then taken to the grinding room. The grinding booth is equipped with an exhaust fan that captures all the particulate and grindings. These grindings are sifted through a screen removing large clumps. The fines are added to the roll-off box and sent off-site for treatment.

After the casting has been ground it is shot blasted in an enclosed piece of equipment. Steel shot is used to polish the casting. At this point the excess lead has been removed from the casting. Castings are then moved to the Machine Shop where the parts are bored to customer specifications. Borings from most of the machining operations are collected and added back into the furnace for remelting.

Ryder has installed a 2 AC machine used for high speed borings. This machine operates at a high speed and requires a coolant to be added. Ryder does not add borings from this machine back to the furnace because they retain moisture from the coolant. Since the furnaces are electric, the higher moisture content in these boring in an electrical environment would create unsafe working conditions. These wet borings are kept separate and sold back to the smelter [Federal Metal].

Ryder also purchases alloy stock from Magnolia Metal. This alloy is delivered to Ryder in long lengths of extruded metal. Ryder cuts to specified length and ships to customer without doing any additional finishing operations. This alloy is not added to the furnaces.

Ryder's 1999 Wastestreams			
Waste stream	EPA Waste Codes	Generation point	Disposal method
Core sand	D008	Knock-out table	Perma-Fix Brownstown Michigan MID 096 963 194 Profile # RYD57904
Baghouse dust	D008	Next to grinding booth	Perma-Fix Brownstown Michigan MID 096 963 194 Profile # RYD57904
Residual from shot blast	D008	Collected in 55 gallon container below filtration device next to shot blast	Perma-Fix Brownstown Michigan MID 096 963 194 Profile # RYD57904

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Ryder Heil Brass

Facility Type: LQG

EPA ID#: OHD 986 981 579

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc.)	Waste Generated (e.g. sludge, spent solvent, ash, etc.)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage (e.g. container, tank, etc.)	Type of On- Site Treatment (recycle, wwt, etc.)	Waste Location (include map if possible)	Name, state, and type of activity occurring at the facility.
1 Pouring brass bushings	spent core sands	D008	8 yards	Roll off container	none	in the Northwest corner of the facility	The waste is sent to Perma Fix in Michigan for disposal.
2							
3							
4							
5							

Comprehensive Compliance Monitoring and Enforcement Report

Page 1

Report run on: January 25, 2001 2:46 PM

Tuesday
Feb 6th

User Selection Criteria

Location:	OHIO	Evaluation Date Range:
Handler Name:	Ryder - Jail	From: 10/01/1980
Handler ID's:	OHD986981579	To: 1/25/2001

Results

Data meeting the criteria you selected follows.
Total Pages: 5

Report Description

This report provides a complete listing of the evaluation, violation, and enforcement activities at each facility meeting the selection criteria. This report may contain enforcement sensitive information.

Report Information

Name: CMECOMP.RDF
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: May 2000
Contact: rcrainfo.help@epa.gov

Stay BT

Tim Killen
(419) 373-3064
Meet @ 8 am
BT NDDO

Tim Killen @ EPA, State of OH
03

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: January 25, 2001 2:46 PM

This report may contain enforcement sensitive data.

RYDER HEIL BRONZE INC, OHD986981579, BUCYRUS, continued -

CEI	Evaluation	03/09/1994	Act Loc: OH	By: State	Person: OHMW	Branch: NW	Reason:	Found Violation: Y
Notes: VIOLATIONS								
Coverage Areas:								

Agency	State	County	City	Zip	Phone	Fax	Web	E-mail	Person	Branch	Reason	Found Violation
RYDER HEIL BRONZE INC	OH	Cuyahoga	Cleveland	44115	216-771-1111	216-771-1112	www.ryderheil.com	ryderheil@comcast.net	RYDER HEIL BRONZE INC	NW	VIOLATIONS	Y

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: January 25, 2001 2:46 PM

This report may contain enforcement sensitive data.

RYDER HEIL BRONZE INC, OHD986981579, BUCYRUS, continued -

Viol. Comment: FAILURE TO MAINTAIN SPILL CONTROL OR DECONTAMINATION EQUIPMENT				OH 1	DPH	OHMW NW	03/09/1994	05/19/1994	S0014	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO BEGIN CONDUCTING ABD RECORDING INSPECTIONS OF EMERG. EQUIPMENT				OH 1	DCP	OHMW NW	03/09/1994	03/20/1996	S0015	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO HAVE CONTINGENCY PLAN DESIGNED TO MINIMIZE HAZARDS				OH 1	DCP	OHMW NW	03/09/1994	03/20/1996	S0016	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: COPY OF CONTINGENCY PLAN IS NOT MAINTAINED ON-SITE & SUBMIT TO AUTHORITIES				OH 1	DCP	OHMW NW	03/09/1994	03/20/1996	S0017	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO DESIGNATE AN EMERGENCY COORDINATOR				OH 1	DMR	OHMW NW	03/09/1994	03/20/1996	S0018	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO MAINTAIN A WRITTEN OPERATING RECORD				OH 1	DCL	OHMW NW	03/09/1994	03/20/1996	S0019	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO HAVE A WRITTEN CLOSURE PLAN				OH 1	DMR	OHMW NW	03/09/1994	03/20/1996	S0020	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO CONDUCT & RECORD WEEKLY INSPECTIONS OF HAZ WASTE STORAGE AREA				OH 1	DWP	OHMW NW	03/09/1994	05/19/1994	S0021	OH 03/17/1994	120	S001	S OHMW NW
Viol. Comment: FAILURE TO MANAGE RUN-OFF FROM HAZS. WASTE STORED IN PILES				OH 1	DWP	OHMW NW	03/09/1994	05/19/1994	S0022	OH 04/12/1994	120	S002	S OHMW NW

Total Number of Handlers: 1

* End of Report *

Comprehensive Permitting Report

Report run on: January 25, 2001 2:47 PM

Version: 1.3

User Selection Criteria

Location: OHIO

County: All County Codes.

Handler Name:

Handler ID: OHD986981579

Results

Data meeting the criteria you selected follows.

Total Pages 2

Report Description

This report lists all permitting data for all facilities that meet the selection criteria.

Report Information

Name: COMPPERM.RDF
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: September 1999
Last Updated: December 18, 2000
Contact: rcrainfo.help@epa.gov

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: January 25, 2001 2:46 PM

User Selection Criteria

Location: OHIO	Evaluation Date Range:
Handler Name:	From: 10/01/1980
Handler ID's: OHD986981579	To: 1/25/2001

Results

Data meeting the criteria you selected follows.
Total Pages: 5

Report Description

This report provides a complete listing of the evaluation, violation, and enforcement activities at each facility meeting the selection criteria. This report may contain enforcement sensitive information.

Report Information

Name: CMECOMP.RDF
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: May 2000
Contact: rcrainfo.help@epa.gov

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: January 25, 2001 2:46 PM

This report may contain enforcement sensitive data.

RYDER HEIL BRONZE INC, OHD986981579, BUCYRUS, continued -

CEI	Evaluation	03/09/1994	Ad Loc: OH	By: State	Person: OHMW	Branch: NW	Reason:	Found Violation: Y
Notes: VIOLATIONS								
Coverage Areas:								

Violation: 251
Ad Loc: OH
By: State
Person: OHMW
Branch: NW
Reason:
Found Violation: Y

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: January 25, 2001 2:46 PM

This report may contain enforcement sensitive data.

RYDER HEIL BRONZE INC, OHD986981579, BUCYRUS, continued -

Viol. Comment: FAILURE TO MAINTAIN SPILL CONTROL OR DECONTAMINATION EQUIPMENT				OH 1	DPP	OHMW	NW	03/09/1994	05/19/1994	S0014	OH 03/17/1994	120	S001	S OHMW	NW
Viol. Comment: FAILURE TO BEGIN CONDUCTING ABD RECORDING INSPECTIONS OF EMERG. EQUIPMENT				OH 1	DCP	OHMW	NW	03/09/1994	03/20/1996	S0015	OH 04/12/1994	120	S002	S OHMW	NW
Viol. Comment: FAILURE TO HAVE CONTINGENCY PLAN DESIGNED TO MINIMIZE HAZARDS				OH 1	DCP	OHMW	NW	03/09/1994	03/20/1996	S0016	OH 03/17/1994	120	S001	S OHMW	NW
Viol. Comment: COPY OF CONTINGENCY PLAN IS NOT MAINTAINED ON-SITE & SUBMIT TO AUTHORITIES				OH 1	DCP	OHMW	NW	03/09/1994	03/20/1996	S0017	OH 04/12/1994	120	S002	S OHMW	NW
Viol. Comment: FAILURE TO DESIGNATE AN EMERGENCY COORDINATOR				OH 1	DMR	OHMW	NW	03/09/1994	03/20/1996	S0018	OH 05/19/1994	120	S003	S OHMW	NW
Viol. Comment: FAILURE TO MAINTAIN A WRITTEN OPERATING RECORD				OH 1	DCL	OHMW	NW	03/09/1994	03/20/1996	S0019	OH 03/17/1994	120	S001	S OHMW	NW
Viol. Comment: FAILURE TO HAVE A WRITTEN CLOSURE PLAN				OH 1	DMR	OHMW	NW	03/09/1994	03/20/1996	S0020	OH 04/12/1994	120	S002	S OHMW	NW
Viol. Comment: FAILURE TO CONDUCT & RECORD WEEKLY INSPECTIONS OF HAZ WASTE STORAGE AREA				OH 1	DWP	OHMW	NW	03/09/1994	05/19/1994	S0021	OH 05/19/1994	120	S003	S OHMW	NW
Viol. Comment: FAILURE TO MANAGE RUN-OFF FROM HAZ. WASTE STORED IN PILES				OH 1	DWP	OHMW	NW	03/09/1994	05/19/1994	S0022	OH 03/17/1994	120	S001	S OHMW	NW

Total Number of Handlers: 1

* End of Report *

Comprehensive Permitting Report

Report run on: January 25, 2001 2:47 PM

Version: 1.3

User Selection Criteria

Location:	OHIO
County:	All County Codes.
Handler Name:	
Handler ID:	OHD986981579

Results

Data meeting the criteria you selected follows.

Total Pages 2

Report Description

This report lists all permitting data for all facilities that meet the selection criteria.

Report Information

Name: COMPERM.RDF
Developed by: EPA Headquarters, Office of Solid Waste
Deployed: September 1999
Last Updated: December 18, 2000
Contact: rcrainfo.help@epa.gov



Handler - Handler Search

Enter the Handler ID you wish to search on:

Handler ID:

Search Cancel Clear Your search has found a total of 1 handler(s).

Search Results

Act Loc	Handler Name	EPA ID	Street No.	Street Address	City	State	Zip Code	County	Universes
OH	RYDER HEIL BRONZE INC	OH0986981579		126 E IRVING ST	BUCYRUS	OH	44820	CRAWFORD	<input type="text" value="SUBJCA"/>

Cancel

URL: /Handler/Handler_srch.asp



Handler Menu



RYDER HEIL BRONZE INC BUCYRUS OHD986981579

The following Source(s) exist for this handler:

Act Loc	Source	Sequence	Receipt Date
OH	N	1	03/13/1996
OH	S	1	03/13/1996

All Data

Add/Update Notification Source Form

Add/Update Part A Form

Universe Calculations

Go To

URL: /Handler/HAND_main.asp

OhioEPA 1999 Annual Hazardous Waste Report

Form IC - Identification and Certification

Name: RYDER-HEIL BRONZE INC
Street Address: 126 E IRVING ST
City: BUCYRUS **OH** 44820-
Mailing Address: P.O. BOX 647
City: BUCYRUS **OH** 44820-0647
EPA ID: OHD986981579
Generated: 62.00
Shipped: 62.00

Contact: MARY WORDEN
Treasurer: TREASURER
Phone: (419)562-2841
Location: Crawford

Generator Status: LQG
On-site Mgmt: Storage Permit- NO
TDR Permit: NO
Waste Min Activities: Source Reduction - NO
Recycling: NO
Waste Min. Assessment: NO

Form GM - Generation and Management

Waste: CORE SAND SOLID HAZARDOUS WASTE
SIC: 3369 **Origin:** 1 **SysType:** Source: A40 **POM:** 1 **Form:** B316 **Rad:** N **PrevYrGen:** 72 **Page:** 1
D008 **Shipped:** Y **Receiving Facility:** OHD05522429 **SysType:** M111 **Avail:** 1 **Quantity:** 62

Form OI - Off-site Transporter and Receiving Facility Information

EPA ID: OHR000028498
Name: TRANS-ENVIRO, INC.
Address: 4500 LEE ROAD
City: CLEVELAND, OH 44128

EPA ID: OHD05522429
Name: REPUBLIC ENVIRONMENTAL SYSTEMS INC
Address: 33 INDUSTRY DRIVE
City: BEDFORD, OH 44146



RYDER HEIL BRONZE INC
126 E IRVING ST
BUCYRUS, OH 44820-1409

Telephone: 419-562-2841
Fax: 419-562-8006
County: CRAWFORD
Metropolitan Statistical Area (MSA): MANSFIELD, OHIO

Industry: WHOLESALE TRADE

Primary Standard Industrial Classification (SIC) and Yellow Page Product Line:
5084 (INDUSTRIAL MACHINERY & EQUIPMENT)
508455 (BUSHINGS (WHOLESALE))

Secondary Standard Industrial Classification (SIC) and Yellow Page Product Line:
3325 (STEEL FOUNDRIES NEC)
332502 (FOUNDRIES-STEEL)
3366 (COPPER FOUNDRIES)
336601 (BRONZE (MANUFACTURERS))
3369 (NONFERROUS FOUNDRIES EXCEPT ALUMINUM)
336903 (CASTINGS)

Employees at this Location: 38 (Actual)
Location Sales(\$): 26,828,000

Top Executive (This Location): JAMES QUAINANCE / PLANT MANAGER

Executives (This Location):
MARY WORDEN / VP FINANCE
CHARLES E KINNEY / VP SALES

Revision Date: October 1999

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Dialog® File Number 531 Accession Number 7949640



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

MEMORANDUM

DATE: August 5, 2009
SUBJECT: Determination of Need for an Investigation
Facility Name: Ryder-Heil Bronze Inc.
EPA ID #: OHD 986 981 579

FROM: Amanda Dampz
Amanda L. Dampz, Environmental Protection Specialist

TO: George Hamper, Chief, Corrective Action Section 2

I recommend the following determination regarding the need for an investigation:

☒ **CA070NO** Determination of Need for an Investigation-Investigation is not Necessary

Reason for Determination

- ☐ Preliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further investigation
- ☐ PA/VSI recommendations do not warrant RRB attention
- ☐ Phase 1 Environmental Site Assessment (ESA) did not recommend further investigation
- ☐ Phase 2 ESA did not recommend further investigation
- ☐ Phase 1/Phase 2 ESA recommendations do not warrant RRB attention
- ☒ Company representative asserts that the site is clean
- ☐ Not subject to corrective action
- ☐ Enrolled in other clean-up program
- ☐ PA/VSI recommendations have been implemented
- ☐ Removal
- ☐ Enrolled Voluntary Remediation Program
- ☐ Completed Voluntary Remediation Program
- ☐ Superfund
- ☐ Superfund No Further Action Decision
- ☐ Superfund Base Relocation and Closure
- ☐ Other

☐ **CA070YE** Determination of Need for an Investigation – Investigation is Necessary

Reason for Determination

- ☐ PA/VSI recommends further investigation
- ☐ ESA recommends further investigation
- ☐ Other

☐ **No determination can be made – More Information Needed**

☒ **Approved**

☐ **Not Approved**

Signed: George Hamper

Date: SEP 30 2009

Determination Date: August 5, 2009

Determination: Company representative asserts that the site is clean.

Facility Contact Form (No PA/VSI)

Facility Name: Ryder-Heil Bronze Inc

EPA ID#: OHD 986 981 579

Address: 126 E Irving St

City: Bucyrus

State: OH

Units Closed: SO3 Spent Core Sandbin

Date: March 14, 1996

Facility Representative: Herbert Kleine

Phone#: 419-562-2841

Email Address: _____

Date of phone conversation: _____

LQG

www.ryderheil.com

Two separate buildings on site.

Main building constructed in 1910, addition in 1970, machine shop added 1995.

Bronze metal mfg.

Y / ☒ Is there known soil or groundwater contamination?

Contaminants:

☒ / N Has the parcel been split or was there a change in ownership?

Y / ☒ / ? Was a Phase 1 or Phase 2 report prepared in connection with a sale of the property?

Y / N Can we have a copy?

☒ / N Is the facility currently operating?

- When was the plant built? 1910
- What products are/were made?
Bronze bearing manufacturing

- What chemicals were used in the process?

-Ingredients: cleaning solvents only

-Solvents for cleaning products:

-Solvents for degreasing machinery:

-Fuels (coal/gasoline/fuel oil):

Y / N Are there any known spills from electrical equipment containing PCBs?

Y / N Have spills always been cleaned up properly?

- What kinds of solid wastes were produced?

HW – core sand which is taken off site by a hazmat certified company

- How were solid wastes managed?

Y / ☐ Waste piles Quantity: _____

Containing: _____

Y / ☐ On-site landfill Quantity: _____

Containing: _____

- How were liquid wastes (such as solvents) managed?

Y / ☐ Drums

Containing: _____

Y / ☐ Above-ground tanks Quantity: _____

Containing: _____

Y / ☐ Underground tanks Quantity: _____ How long have they been in use? _____

What are they made out of: Steel / Cement / Other: _____

Any known leaks: _____

Y / ☐ Underground pipes

Containing: _____

- How were wastewaters managed?

Y / ☐ Tanks

Y / ☐ Pits, ponds, or lagoons (surface impoundments)

**FEDERAL METAL CO**

7250 DIVISION ST
CLEVELAND, OH 44146-5495

Telephone: 440-232-8700

Fax: 440-232-8726

County: CUYAHOGA

Metropolitan Statistical Area (MSA): CLEVELAND-LORAIN-ELYRIA, OHIO

Industry: MANUFACTURING

Primary Standard Industrial Classification (SIC) and Yellow Page Product Line:

3339 (PRIMARY SMELTING/REFINING-NONFERROUS)

333902 (SMELTERS & REFINERS-BASE METALS)

Secondary Standard Industrial Classification (SIC) and Yellow Page Product Line:

3331 (PRIMARY SMELTING & REFINING OF COPPER)

333198 (PRIMARY SMELTING & REFINING OF COPPER)

3364 (NONFERROUS DIE-CASTINGS-EX ALUMINUM)

336401 (DIE CASTING METALS (MANUFACTURERS))

3366 (COPPER FOUNDRIES)

336698 (COPPER FOUNDRIES)

5093 (SCRAP & WASTE MATERIALS)

509313 (SCRAP METALS & IRON (WHOLESALE))

Employees at this Location: 60 (Actual)

Location Sales(\$): 25,000,000

Top Executive (This Location): DAVID R NAGUSKY / PRESIDENT

Executives (This Location):

JAMES KROMER / VP FINANCE

CHRIS KALO / VP HUMAN RES

RIK KOHEN / VP SALES

Revision Date: September 2000

American Business Directory

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MINSTER MACHINE CO
240 W 5TH ST
MINSTER, OH 45865-1065

Telephone: 419-628-2331
Fax: 419-628-3517
County: AUGLAIZE
Metropolitan Statistical Area (MSA): LIMA, OHIO

Industry: MANUFACTURING

Primary Standard Industrial Classification (SIC) and Yellow Page Product Line:
3542 (MACHINE TOOLS-METAL FORMING TYPES)
354201 (PRESSES-POWER (MANUFACTURERS))

Secondary Standard Industrial Classification (SIC) and Yellow Page Product Line:
5099 (DURABLE GOODS NEC)
509901 (EXPORTERS)
5099 (DURABLE GOODS NEC)
509905 (IMPORTERS)

Employees at this Location: 900 (Actual)
Location Sales(\$): 186,300,000

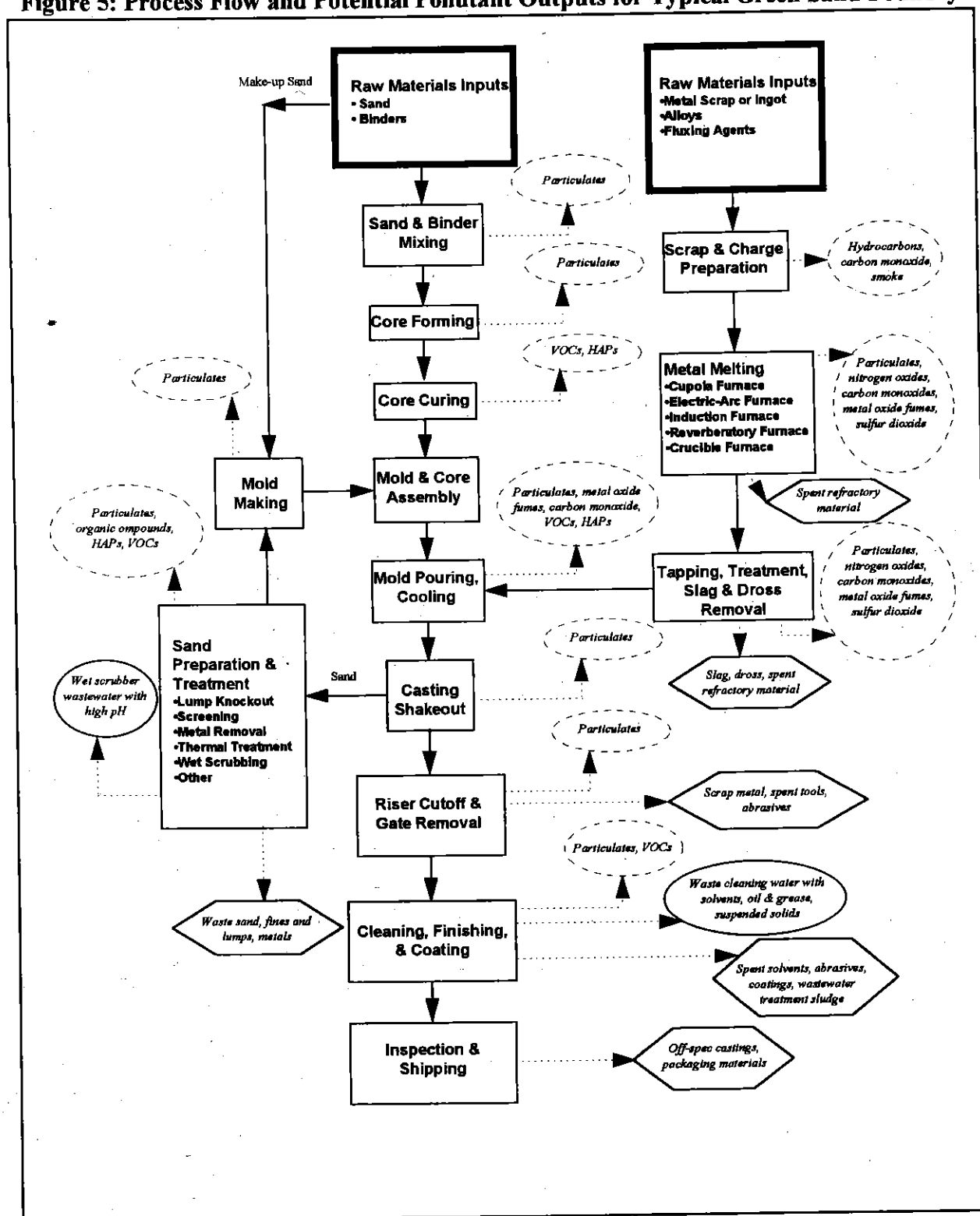
Top Executive (This Location): JOHN WINCH / PRESIDENT

Executives (This Location):
RANDALL BUSCOOM / VP DATA PROC
ROBERT SUDHOFF / VP FINANCE
STEVE KILL / VP HUMAN RES
DAVID WINCH / VP MARKETING
DAVID WINCH / VP SALES
DON LEAK / PLANT MANAGER
BILL NICHOLSON / PUR AGENT

Revision Date: May 2000

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Figure 5: Process Flow and Potential Pollutant Outputs for Typical Green Sand Foundry



Source: Adapted from Kotzin, *Air Pollution Engineering Manual: Steel Foundries*, 1992.